

1 SCOTT J. SAGARIA (BAR # 217981)
2 SCOTT M. JOHNSON (BAR #287182)
3 SAGARIA LAW, P.C.
4 3017 Douglas Boulevard, Suite 100
Roseville, CA 95661
408-279-2288 ph
408-279-2299 fax

5 Attorneys for Debtor

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

In re
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
TIMOTHY MICHAEL RUNNING,
Debtor.

Case No. 17-50928 MEH 13

Chapter 13

**STIPULATION RESOLVING MOTION
TO VALUE PERSONAL PROPERTY**

TIMOTHY MICHAEL RUNNING (“Debtor”) and SYSTEMS & SERVICES TECHNOLOGIES, INC., servicer for MEDALLION BANK (“Secured Creditor”) stipulate and agree as follows:

I. STATEMENT OF FACTS

1. Debtor filed the instant chapter 13 bankruptcy case on April 20, 2017.
2. Secured Creditor holds a claim secured by a 2006 Monaco Mackenzie Starlite Trailer (the “Vehicle”) in the amount of \$20,984.62.
3. On May 31, 2017, Debtor filed a Motion to Value Personal Property (the “Motion”) seeking to value the Vehicle at \$10,000.00.
4. On June 5, 2017, Secured Creditor filed an Opposition to the Motion and Objection to Confirmation of the Chapter 13 Plan.

II. STIPULATION

5. The recitals set forth above are incorporated herein by this reference and are a material part of this Stipulation.
6. Debtor and Secured Creditor stipulate that the value of the Vehicle is \$13,000.00.

1 7. Secured Creditor shall have a secured claim in the amount **\$13,000.00** to be paid
2 through Debtor's Chapter 13 plan.

3 8. Secured Creditor shall receive five (5) percent interest on its secured claim

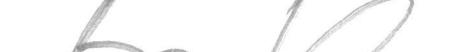
4 9. Debtor filed an Amended Chapter 13 Plan which conforms to the terms of this
5 stipulation.

6 10. Entry of an Order approving this Stipulation shall constitute withdrawal of the
7 objection to confirmation filed on June 5, 2017 and appearing on the docket at No. 15.

9 IT IS SO STIPULATED AND AGREED.

10 DATED: August 21, 2017

By:


AUSTIN NAGEL, Esq.
Attorneys for Secured Creditor
Systems & Services Technologies, Inc., servicer
for Medallion Bank

SAGARIA LAW, P.C.

DATED: August 17, 2017

By: /s/ Scott M. Johnson

SCOTT M. JOHNSON
Attorney for Debtor,
Timothy Michael Running